

October 3, 2018

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

**Re: *Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer
Control of Licenses and Authorizations, MB Docket No. 14-90***

Dear Ms. Dortch:

AT&T Inc. (“AT&T”) respectfully requests approval of the schedule set forth below for the final compliance report filings for the AT&T/DIRECTV merger conditions. The Independent Compliance Officer (“ICO”) has represented to AT&T and the Commission staff that he agrees with this schedule and supports this request.

Appendix B of the Commission’s Memorandum Opinion and Order in the above-referenced proceeding (“Appendix B”) does not specify the compliance report schedule as the merger conditions approach expiration on July 24, 2019.¹ Accordingly, AT&T and the Independent Compliance Officer (the “ICO”) have worked together to develop a proposed schedule that will ensure the integrity and accuracy of AT&T’s final compliance report filings as well as provide sufficient time for the ICO to complete its final evaluation of AT&T’s efforts to comply with the merger conditions. The proposed schedule is non-material, procedural and consistent with the language of Appendix B, and would not alter in any way the substantive requirements of the conditions. The Bureau thus has authority and discretion to approve this proposed schedule.

The proposed reporting schedule is as follows:

- AT&T’s compliance report, covering FTTP deployment, the provision of gigabit FTTP service to covered E-rate eligible schools and libraries (“E-rate”), non-discriminatory

¹ The relevant reporting conditions in Appendix B require that AT&T submit a report on a “semiannual” basis, “with the first such report to be submitted six (6) months after the Closing Date.” See App. B §§ III.3. The conditions do not set forth the exact date that subsequent reports must be filed.

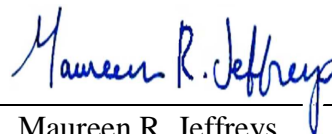
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usage-based practices, and the discounted broadband service program for the period of January 1, 2019 through July 24, 2019, will be filed on September 24, 2019. The ICO's compliance report covering E-rate, non-discriminatory usage-based practices, and discounted broadband service program will be filed on November 25, 2019. The ICO's compliance report covering FTTP will be filed on March 25, 2020.

- AT&T's compliance report, covering the discounted broadband program condition for the period of July 25, 2019 through December 31, 2019, will be filed on February 24, 2020. The ICO's compliance report will be filed on April 24, 2020.
- AT&T's final compliance report, covering the discounted broadband program condition for the period of January 1, 2020 through April 22, 2020, will be filed on June 1, 2020. The ICO's final compliance report will be filed on July 31, 2020.²

AT&T appreciates your prompt attention to this request. Please contact me if you have any questions.

Respectfully submitted,



Maureen R. Jeffreys
Counsel for AT&T Inc.

cc (via email): Jim Bird, Esq.
Neil Dellar, Esq.
Jeffrey Gee, Esq.
Michael Ray, Esq.
Donald K. Stern, Esq., Independent Compliance Officer
Best Copy and Printing, Inc.

² The reports for the 2018 reporting periods (January 1-June 30, 2018 and July 1-December 31, 2018) will follow the schedule set forth in the Wireline Competition Bureau's letter approving AT&T's request that the compliance reports will be due on February 24 and August 24 each year. *Letter from Matthew DelNero, Chief, Wireline Competition Bureau, to Maureen R. Jeffreys, Esq., Arnold & Porter, DA 16-1370 (Dec. 9, 2016).*